

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

DAVID OAKES,

Plaintiff,

v.

UNITED STATES OF AMERICA,

Defendant.

Case No. 3:20-cv-5822 BHS

STIPULATED MOTION FOR EXTENSION
OF TIME FOR EXPERT DISCLOSURES

JOINT STIPULATION

COMES NOW Plaintiff, David Oakes, by and through his attorney, Thaddeus P. Martin, and Defendant, United States of America, through its counsel, Assistant United States Attorney Matt Waldrop, stipulate and agree to an extension of time for disclosure of expert testimony under FRCP 26(a)(2) to July 28, 2021.

A court may modify a schedule for good cause. Fed. R. Civ. P. 16(b)(4). Continuing pretrial and trial dates is within the discretion of the trial judge. See *King v. State of California*, 784 F.2d 910, 912 (9th Cir. 1986). Here, the current expert disclosure deadline is June 28, 2021. The parties just completed fact witness depositions and would like the opportunity to discuss resolution of this matter prior to disclosing and deposing any experts. The parties through their counsel further agree that neither party will be prejudiced by this agreement.

1 DATED this 28th day of June, 2021.

2 Respectfully submitted,

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Acting United States Attorney

5 s/Thaddeus P. Martin

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